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16 **UNITED STATES BANKRUPTCY COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA**
18 **SAN FRANCISCO DIVISION**

19 **In re:**

20 **PG&E CORPORATION,**

21 **- and -**

22 **PACIFIC GAS AND ELECTRIC**
23 **COMPANY,**

24 **Debtors.**

- 25 Affects PG&E Corporation
26 Affects Pacific Gas and Electric Company
27 Affects both Debtors

28 * *All papers shall be filed in the Lead Case, No.*
19-30088 (DM).

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF LAURA L. GOODMAN
IN SUPPORT OF REORGANIZED
DEBTORS' OBJECTION TO PROOF OF
CLAIM NO. 58562 FILED BY FULCRUM
CREDIT PARTNERS LLC AS TRANSFEREE
OF TUSCAN RIDGE ASSOCIATES, LLC**

Response Deadline:
October 26, 2021, 4:00 p.m. (Pacific Time)

Hearing Information If Timely Response Made:
Date: November 9, 2021
Time: 10:00 a.m. (Pacific Time)
Place: (Tele/Videoconference Appearances Only)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 I, Laura L. Goodman hereby declare:

2 I am an attorney at law licensed to practice in the State of California and admitted to the bar of
3 this Court. I am an attorney with Gough & Hancock LLP, counsel for Debtors herein. I make this
4 Declaration in support of the *Reorganized Debtors' Objection to Proof of Claim No. 58562 filed by*
5 *Fulcrum Credit Partners LLC as Transferee of Tuscan Ridge Associates, LLC*, filed
6 contemporaneously herewith. Unless stated otherwise, I have personal knowledge of the matters set
7 forth herein:

8 1. Attached for the Court's convenience as **Exhibit A** is a true and correct copy of the
9 Proof of Claim filed by Tuscan Ridge Associates with Attachments 1-3.

10 2. Attached as **Exhibit B** is a true and correct copy of the November 20, 2018 Letter
11 Agreement between Tuscan Ridge Associates, LLC and Pacific Gas & Electric Company as attached
12 to the Proof of Claim.

13 3. Attached hereto as **Exhibit C** is a true and correct filed-stamped copy of a March 5,
14 2020 verified Complaint for Breach of Contract, For Breach of the Implied Covenant of Good Faith
15 and Fair Dealing; Petition to Compel filed by Tuscan Ridge Associates, Inc. against ECC Constructors,
16 LLC that I retrieved from the Butte County Superior Court online portal. The verification is signed by
17 Scott Bates as Managing Member for Tuscan Ridge Associates, Inc.

18 4. Attached hereto as **Exhibit D** is a true and correct filed-stamped copy of a March 9,
19 2020 Errata to Complaint filed by Tuscan Ridge Associates Inc. against ECC Constructors, LLC with
20 Exhibits A-D that I retrieved from the Butte County Superior Court online portal. The highlighting on
21 Exhibit C is on the copy of this document as retrieved from the Butte County Superior Court online
22 portal and not my own.

23 5. Attached hereto as **Exhibit E** is a true and correct filed-stamped copy of a March 11,
24 2020 Declaration of Scott Bates in Support of Ex Parte Application for Writ of Attachment that I
25 retrieved from the Butte County Superior Court online portal.

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1 I declare under penalty of perjury and in accordance with laws of the United States of America
2 that the foregoing is true and correct.

3 Dated: September 22, 2021

/s/ Laura L. Goodman

Laura L. Goodman

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